

FOR PURPOSE LAW GROUP

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UNITED STATES DISTRICT COURT

CENTRAL DISTRICT OF CALIFORNIA

JOHN C. VERNILE,
Petitioner,
vs.
PACIFICA FOUNDATION INC., a
California Nonprofit Public Benefit
Corporation,
Respondent.

PACIFICA FOUNDATION INC., a
California Nonprofit Public Benefit
Corporation,
Cross-Petitioner,
vs.
JOHN C. VERNILE,
Cross-Respondent.

Case No. 2:22-cv-02599-SVW-PVC

**NOTICE OF MOTION AND
MOTION FOR SUMMARY
JUDGMENT
[FRCP 56]**

Date: August 22, 2022

Time: 1:30 PM

Courtroom: 10A

Judge: Hon. Stephen V. Wilson

1 TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

2 PLEASE TAKE NOTICE THAT ON August 22, 2022 at 1:30 p.m., or soon
3 thereafter as the matter may be heard, in Courtroom 10A before the Honorable
4 Stephen V. Wilson of the United States District Court, Central District of
5 California, First Street Courthouse located at 350 W. 1st Street, 10th Floor, Los
6 Angeles, California 90012, Respondent Pacifica Foundation Inc.'s ("Pacifica")
7 Motion to for Summary Judgment (the "Motion") will come on for hearing.

8 PLEASE TAKE FURTHER NOTICE THAT the Motion will be made
9 pursuant to the Court's July 18, 2022 minute order (Dckt. No. 45) and on the basis
10 that the arbitrator exceeded her authority and adopted procedures that were patently
11 prejudicial to Pacifica when she issued her arbitration award.

12 PLEASE TAKE FURTHER NOTICE THAT this Motion is based this
13 Notice, the accompanying Memorandum of Points and Authorities, the Declaration
14 of Arthur Schwartz, Esq. and Pacifica's Separate Statement of Undisputed Material
15 Facts submitted concurrently herewith, the records on file in this action, and on such
16 evidence as may be presented at the hearing.

17 Dated: August 1, 2022

FOR PURPOSE LAW GROUP

18 By: /s/ Matthew B. Learned

19 Matthew B. Learned, Esq.
20 Attorney for Respondent,
21 Pacifica Foundation Inc.

22 Dated: August 1, 2022

**ADVOCATES FOR JUSTICE,
CHARTERED ATTORNEYS**

24 By: /s/ Arthur Z. Schwartz

25 Arthur Z. Schwartz, Esq.
26 Proposed Attorney for Respondent,
27 Pacifica Foundation Inc., *Pro Hac Vice*
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